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ELLIOTT C. LICHTMAN
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RECEIVED
07 NOV 2007
KAREN A. POST
LILAH S. ROSENBLUM
ALLEN H. MATTISON
ADMITTED IN MARYLAND ONLY
LAURENCE E. GOLD
Of Counsel

November 14, 2007

VIA HAND DELIVERY

Ms. Patrina Clark
Staff Director
Federal Election Commission
c/o Secretary of the Senate
Office of Public Records
232 Hart Senate Office Building
Washington, DC 20510-7116

Re: Matt Brown for U.S. Senate, FEC ID # C00409722

Dear Ms. Clark:

I am writing to submit the enclosed Form 8, the proposed debt settlement plan for the Matt Brown for U.S. Senate committee ("the Committee"), FEC ID No. C00409722. The Committee is terminating, but lacks sufficient funds to pay its outstanding creditors in full. Accordingly, the Committee seeks the Commission's review and approval of its plan to settle its debts by paying its eight locatable creditors (of nine total creditors) 50 percent of the amounts they are owed by the committee, a settlement that each of these creditors has approved by signing the appropriate section of Form 8.

The Committee previously submitted Form 8 to the Commission on April 25, 2007, as supplemented on May 8, 2007. Subsequently, consideration of the Committee's proposed plan was delayed while the Commission sought to resolve other issues raised in an internal referral to the Office of General Counsel that the Commission assigned to the Commission's Alternative Dispute Resolution (ADR) program. The parties settled all of those issues on October 22, 2007, in ADR # 408; a copy of that agreement is attached.

The Committee now resubmits its debt settlement plan and respectfully requests expedited consideration of it, as the Committee would like to file its termination report by December 31, 2007, and avoid the burden of further administrative and reporting obligations.

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Per my conversations with Navarro Moore of your office, and as we understand were confirmed with Assistant Staff Director Patricia Carmona, the Committee is proceeding as follows. We are submitting an updated Part I of Form 8 that is current as of September 30, 2007, the closing date of the Committee's last report; blank Parts II and III; and a complete copy of the previously submitted Form 8 and attachments, all but Part I of which remain current and should be considered by the Commission now.

The committee has total debts of \$417,245.79, including \$205,995.80 owed to nine creditors. The committee has proposed to each creditor settling its respective undisputed debts for 50 percent of the outstanding amount. Eight of the nine creditors have accepted this offer. The ninth creditor, Ms. Jocelyn Augustino, who is owed a total of \$5,264.54, has yet to respond to repeated attempts to contact her. (Copies of the Committee's letters to her are enclosed.) In light of her failure to respond, the Committee proposes to settle the \$200,731.26 owed to the other eight creditors by paying them a total of \$100,365.63. Should Ms. Augustino respond, the committee will reiterate its offer to settle the debt owed her for a payment of \$2,632.27.

The Committee had \$10,394.86 cash on hand as of September 30, 2007, the date of its last FEC report. The candidate, Matthew Brown, will make such contributions from his personal funds to the Committee as are necessary for the Committee to meet its obligations under the debt settlement plan. In addition, the candidate is currently owed \$211,250.00 for loans he made to the Committee. The candidate would forgive the entirety of that debt.

Please direct the Commission's response to the proposed debt settlement plan to the undersigned in addition to the Committee's Treasurer, Timothy Patterson. Again, we request expedited consideration so that the Committee may terminate by December 31. Thank you for your consideration.

Yours truly,



Laurence E. Gold
Counsel to Matt Brown for U.S. Senate

Cc: Timothy Patterson
Matthew Brown

Enclosures:

FEC Form 8, October 31, 2007 (Part I completed; Parts II and III blank)
FEC Form 8, April 25 and May 8, 2007
Negotiated Settlement and Certification, ADR 408, October 23, 2007

DEBT SETTLEMENT PLAN

NAME OF COMMITTEE Matt Brown for U.S. Senate		SECRETARY OF THE SENATE 07 NOV 14 PM 5:35
ADDRESS 96 Everett Avenue		
CITY, STATE AND ZIP CODE Providence, RI 02906		FEC I.D. NUMBER C00409722

PART I — COMMITTEE SUMMARY INFORMATION

1. CASH ON HAND AS OF <u>9/30/07</u>	\$10,394.86	6. TOTAL AMOUNT OF DEBTS OWED BY THE COMMITTEE	\$417,245.79
2. TOTAL ASSETS TO BE LIQUIDATED	\$0	7. TOTAL NUMBER OF CREDITORS OWED	10
3. TOTAL (ADD 1 AND 2)	\$10,394.86	8. NUMBER OF CREDITORS IN PART II OF THIS PLAN	9
4. YEAR TO DATE RECEIPTS	\$5,974.80	9. TOTAL AMOUNT OF DEBTS OWED TO THE CREDITORS IN PART II OF THIS PLAN	\$411,981.26
5. YEAR TO DATE DISBURSEMENTS	\$20,663.08	10. TOTAL AMOUNT TO BE PAID TO CREDITORS IN PART II OF THIS PLAN	\$100,365.63

11. IS THE COMMITTEE TERMINATING ITS ACTIVITIES?

☒ YES ☐ NO

IF YES, WHEN DOES THE COMMITTEE EXPECT TO FILE A TERMINATION REPORT? IF NO, COMMITTEE IS NOT ELIGIBLE TO FILE A DEBT SETTLEMENT PLAN (SEE INSTRUCTIONS).

The committee plans to file a termination report by December 31, 2007.

12. IF THIS IS AN AUTHORIZED COMMITTEE, DOES THE CANDIDATE HAVE OTHER AUTHORIZED COMMITTEES?

☐ YES ☒ NO

IF YES, LIST BELOW.

13. DOES THE COMMITTEE HAVE SUFFICIENT FUNDS TO PAY THE TOTAL AMOUNT INDICATED IN THIS PLAN?

☐ YES ☒ NO

IF NO, WHAT STEPS WILL BE TAKEN TO OBTAIN THE FUNDS?

The candidate intends to pay any additional funds necessary to pay the total amount indicated in this plan from his own personal funds.

14. HAS THE COMMITTEE FILED PREVIOUS DEBT SETTLEMENT PLANS?

☒ YES ☐ NO

The committee previously submitted a debt settlement plan on April 25, 2007, and submitted additional attachments on May 8, 2007. Consideration of that proposal was delayed while the FEC and the committee sought to resolve other issues through the Commission's ADR program. Those issues were settled on October 22, 2007, and the committee now resubmits its debt settlement plan.

15. AFTER DISPOSING OF ALL THE COMMITTEE'S DEBTS AND OBLIGATIONS, WILL THERE BE ANY RESIDUAL FUNDS?

☐ YES ☒ NO

IF YES, HOW WILL THE FUNDS BE DISBURSED?

I certify, to the best of my knowledge, that the information contained in this Debt Settlement Plan is true, correct and complete.

SIGNATURE OF
TREASURER OF
COMMITTEE



DATE

10/31/07

FEC FORM 8
(Revised 1/2001)

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE	FEC I.D. NUMBER	PAGE	OF
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CREDITOR SUMMARY INFORMATION (FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR	DATE INCURRED	AMOUNT OWED TO CREDITOR	AMOUNT OFFERED IN SETTLEMENT

TYPE OF CREDITOR:

☐ INCORPORATED COMMERCIAL VENDOR ☐ UNINCORPORATED COMMERCIAL VENDOR ☐ CANDIDATE ☐ COMMITTEE EMPLOYEE ☐ OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

CREDITOR SECTION (TO BE FILLED OUT BY CREDITOR)

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☐ YES ☐ NO IF NO, PLEASE EXPLAIN

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

☐ YES ☐ NO IF NO, PLEASE EXPLAIN

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF
CREDITOR OR
REPRESENTATIVE

DATE

DEBT SETTLEMENT PLAN

PART III

NAME OF COMMITTEE	FEC I.D. NUMBER	PAGE	OF
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LIST REMAINING DEBTS

A. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR	AMOUNT OWED TO CREDITOR	AMOUNT EXPECTED TO PAY/OFFER
<p>TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE</p> <p><input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL</p> <p>IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>		
<p>B. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR</p> <p>TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE</p> <p><input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL</p> <p>IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>	AMOUNT OWED TO CREDITOR	AMOUNT EXPECTED TO PAY/OFFER
<p>C. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR</p> <p>TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE</p> <p><input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL</p> <p>IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>	AMOUNT OWED TO CREDITOR	AMOUNT EXPECTED TO PAY/OFFER
<p>D. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR</p> <p>TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE</p> <p><input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL</p> <p>IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>	AMOUNT OWED TO CREDITOR	AMOUNT EXPECTED TO PAY/OFFER
<p>E. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR</p> <p>TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE</p> <p><input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL</p> <p>IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>	AMOUNT OWED TO CREDITOR	AMOUNT EXPECTED TO PAY/OFFER

DOES THE COMMITTEE HAVE SUFFICIENT FUNDS TO PAY THE REMAINING AMOUNTS TO BE PAID OR OFFERED?

☐ YES ☐ NO IF NO, WHAT STEPS WILL BE TAKEN TO OBTAIN THE FUNDS?

LAW OFFICES
LICHTMAN, TRISTER & ROSS, PLLC
1666 CONNECTICUT AVENUE, N.W., FIFTH FLOOR OF THE SENATE
WASHINGTON, D.C. 20009

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07 NOV 14 PM 5:36

KAREN A. POST
LILAH S. ROSENBLUM
ALLEN H. MATTISON
ADMITTED IN MARYLAND ONLY

LAURENCE E. GOLD
Of Counsel

April 25, 2007

VIA HAND DELIVERY

Ms. Patrina Clark
Staff Director
Federal Election Commission
c/o Secretary of the Senate
Office of Public Records
232 Hart Senate Office Building
Washington, DC 20510-7116

Re: Matt Brown for U.S. Senate, FEC I.D. # C00409722

Dear Ms. Clark:

I am writing to submit the enclosed Federal Election Commission Form 8, which details the proposed debt settlement plan for the Matt Brown for U.S. Senate committee, FEC ID No. C00409722. The committee is terminating, but lacks sufficient funds to pay its outstanding creditors in full. Accordingly, the committee seeks the Commission's review and approval of its plan to settle its debts by paying eight of its nine creditors 50 percent of the amounts they are owed by the committee.

The committee has total debts of \$417,245.79, including \$205,995.80 owed to nine creditors. The committee has proposed to each creditor settling their respective undisputed debts for 50 percent of the outstanding amount. Eight of the nine creditors have accepted this offer. The ninth creditor, Ms. Jocelyn Augustino, who is owed a total of \$5,264.54, has yet to respond to repeated attempts to contact her. (Copies of the Committee's letters to her are enclosed.) In light of her failure to respond, the committee proposes to settle the \$200,731.26 owed to the other eight creditors by paying them a total of \$100,365.63. Should Ms. Augustino respond, the committee will reiterate its offer to settle the debt owed her for a payment of \$2,632.27.

The committee had \$29,659.16 cash on hand as of March 31, 2007, the date of its last FEC report. The candidate, Matthew Brown, will make such contributions from his personal funds to the committee as are necessary for the committee to meet its obligations under the debt

27020390692

settlement plan. In addition, the candidate is currently owed \$211,250.00 for loans he made to the committee. The candidate would forgive the entirety of that debt.

Please direct the Commission's response to the proposed debt settlement plan to the undersigned in addition to the committee's Treasurer, James Vincent. Thank you for your consideration..

Sincerely,



Laurence E. Gold
Counsel to Matt Brown for U.S. Senate

Cc: James Vincent
Matthew Brown

Enclosure:

FEC Form 8

DEBT SETTLEMENT PLAN

NAME OF COMMITTEE Matt Brown for U.S. Senate	SECRETARY OF THE SENATE 07 NOV 14 PM 5:36
ADDRESS P.O. Box 10180	
CITY, STATE AND ZIP CODE Cranston, RI 02910	FEC I.D. NUMBER C00409722

PART I -- COMMITTEE SUMMARY INFORMATION

1. CASH ON HAND AS OF 03/31/07	\$29,659.16	6. TOTAL AMOUNT OF DEBTS OWED BY THE COMMITTEE	\$417,245.79
2. TOTAL ASSETS TO BE LIQUIDATED	\$0	7. TOTAL NUMBER OF CREDITORS OWED	10
3. TOTAL (ADD 1 AND 2)	\$29,659.16	8. NUMBER OF CREDITORS IN PART II OF THIS PLAN	9
4. YEAR TO DATE RECEIPTS	\$5,000.00	9. TOTAL AMOUNT OF DEBTS OWED TO THE CREDITORS IN PART II OF THIS PLAN	\$411,981.26
5. YEAR TO DATE DISBURSEMENTS	\$423.98	10. TOTAL AMOUNT TO BE PAID TO CREDITORS IN PART II OF THIS PLAN	\$100,365.63

11. IS THE COMMITTEE TERMINATING ITS ACTIVITIES?

☒ YES ☐ NO

IF YES, WHEN DOES THE COMMITTEE EXPECT TO FILE A TERMINATION REPORT? IF NO, COMMITTEE IS NOT ELIGIBLE TO FILE A DEBT SETTLEMENT PLAN (SEE INSTRUCTIONS).

12. IF THIS IS AN AUTHORIZED COMMITTEE, DOES THE CANDIDATE HAVE OTHER AUTHORIZED COMMITTEES?

☐ YES ☒ NO

IF YES, LIST BELOW.

13. DOES THE COMMITTEE HAVE SUFFICIENT FUNDS TO PAY THE TOTAL AMOUNT INDICATED IN THIS PLAN?

☐ YES ☒ NO

IF NO, WHAT STEPS WILL BE TAKEN TO OBTAIN THE FUNDS?

The candidate intends to pay any additional funds necessary to pay the total amount indicated in this plan from his own personal funds.

14. HAS THE COMMITTEE FILED PREVIOUS DEBT SETTLEMENT PLANS?

☐ YES ☒ NO

15. AFTER DISPOSING OF ALL THE COMMITTEE'S DEBTS AND OBLIGATIONS, WILL THERE BE ANY RESIDUAL FUNDS?

☐ YES ☒ NO

IF YES, HOW WILL THE FUNDS BE DISBURSED?

I certify, to the best of my knowledge, that the information contained in this Debt Settlement Plan is true, correct and complete.

SIGNATURE OF
TREASURER OF
COMMITTEE

DATE

4/20/07

FEC FORM 8
(Revised 1/2001)

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Matt Brown for U.S. Senate	FEC I.D. NUMBER C00409722	PAGE 2	OF 11
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CREDITOR SUMMARY INFORMATION (FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR	DATE INCURRED	AMOUNT OWED TO CREDITOR	AMOUNT OFFERED IN SETTLEMENT
Gilbert & Wolfand, P.C. 2201 Wisconsin Ave., N.W. Washington, DC 20007	01/31/06	\$2,605.00	\$1,302.50

TYPE OF CREDITOR:

☒ INCORPORATED COMMERCIAL VENDOR ☐ UNINCORPORATED COMMERCIAL VENDOR ☐ CANDIDATE ☐ COMMITTEE EMPLOYEE ☐ OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Vendor billed committee for services rendered on monthly basis. No extensions were granted.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

The committee has tried to pay this creditor as much as the committee's resources have allowed, without favor with respect to other creditors. The committee sold its physical assets (e.g. computers, phone system, office furniture) and research in order to raise funds. The candidate decided to use personal assets, to the best of his financial ability, to make substantial contributions to the committee in order to make creditors as whole as possible. The candidate is also forgiving a very substantial debt, \$211,250.00, owed to him by the committee. The committee undertook debt-reduction fundraising efforts, but raised little from doing so.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

Final bill and oral requests for payment.

CREDITOR SECTION (TO BE FILLED OUT BY CREDITOR)

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF
CREDITOR OR
REPRESENTATIVE

SEE ATTACHED

DATE

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Matt Brown for U.S. Senate	FEC I.D. NUMBER C00409722	PAGE 3	OF 11
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CREDITOR SUMMARY INFORMATION (FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR Benenson Strategy Group 1054 31st St., N.W., Ste. 526 Washington, DC 20007	DATE INCURRED 03/31/06	AMOUNT OWED TO CREDITOR \$23,400.90	AMOUNT OFFERED IN SETTLEMENT \$11,700.45
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TYPE OF CREDITOR:

☒ INCORPORATED COMMERCIAL VENDOR ☐ UNINCORPORATED COMMERCIAL VENDOR ☐ CANDIDATE ☐ COMMITTEE EMPLOYEE ☐ OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Vendor billed committee for services rendered on monthly basis. No extensions were granted.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

The committee has tried to pay this creditor as much as the committee's resources have allowed, without favor with respect to other creditors. The committee sold its physical assets (e.g. computers, phone system, office furniture) and research in order to raise funds. The candidate decided to use personal assets, to the best of his financial ability, to make substantial contributions to the committee in order to make creditors as whole as possible. The candidate is also forgiving a very substantial debt, \$211,250.00, owed to him by the committee. The committee undertook debt-reduction fundraising efforts, but raised little from doing so.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

Final bill and oral requests for payment.

CREDITOR SECTION (TO BE FILLED OUT BY CREDITOR)

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF
CREDITOR OR
REPRESENTATIVE

➤ SEE ATTACHED

DATE

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Matt Brown for U.S. Senate	FEC I.D. NUMBER C00409722	PAGE 4	OF 11
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CREDITOR SUMMARY INFORMATION (FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR Grassroots Solutions, Inc. 2929 University Ave., S.W., Ste. 100 Minneapolis, MN 55414	DATE INCURRED 03/31/06	AMOUNT OWED TO CREDITOR \$13,000.00	AMOUNT OFFERED IN SETTLEMENT \$6,500.00
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TYPE OF CREDITOR:

☒ INCORPORATED COMMERCIAL VENDOR ☐ UNINCORPORATED COMMERCIAL VENDOR ☐ CANDIDATE ☐ COMMITTEE EMPLOYEE ☐ OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Vendor billed committee for services rendered on monthly basis. No extensions were granted.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

The committee has tried to pay this creditor as much as the committee's resources have allowed, without favor with respect to other creditors. The committee sold its physical assets (e.g. computers, phone system, office furniture) and research in order to raise funds. The candidate decided to use personal assets, to the best of his financial ability, to make substantial contributions to the committee in order to make creditors as whole as possible. The candidate is also forgiving a very substantial debt, \$211,250.00, owed to him by the committee. The committee undertook debt-reduction fundraising efforts, but raised little from doing so.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

Final bill and oral requests for payment.

CREDITOR SECTION (TO BE FILLED OUT BY CREDITOR)

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF
CREDITOR OR
REPRESENTATIVE

➤ SEE ATTACHED

DATE

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Matt Brown for U.S. Senate	FEC I.D. NUMBER C00409722	PAGE 5	OF 11
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CREDITOR SUMMARY INFORMATION

(FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR MacWilliams, Robinson & Partners 1660 L St., N.W. Washington, DC 20036	DATE INCURRED 03/31/06	AMOUNT OWED TO CREDITOR \$36,344.74	AMOUNT OFFERED IN SETTLEMENT \$18,172.37
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TYPE OF CREDITOR:

☒ INCORPORATED COMMERCIAL VENDOR ☐ UNINCORPORATED COMMERCIAL VENDOR ☐ CANDIDATE ☐ COMMITTEE EMPLOYEE ☐ OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Vendor billed committee for services rendered on monthly basis. No extensions were granted.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

The committee has tried to pay this creditor as much as the committee's resources have allowed, without favor with respect to other creditors. The committee sold its physical assets (e.g. computers, phone system, office furniture) and research in order to raise funds. The candidate decided to use personal assets, to the best of his financial ability, to make substantial contributions to the committee in order to make creditors as whole as possible. The candidate is also forgiving a very substantial debt, \$211,250.00, owed to him by the committee. The committee undertook debt-reduction fundraising efforts, but raised little from doing so.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

Final bill and oral requests for payment.

CREDITOR SECTION

(TO BE FILLED OUT BY CREDITOR)

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF CREDITOR OR REPRESENTATIVE > SEE ATTACHED

DATE

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Matt Brown for U.S. Senate	FEC I.D. NUMBER C00409722	PAGE 6	OF 11
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CREDITOR SUMMARY INFORMATION (FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR Net Politics Group 1660 L St., N.W. Washington, DC 20036	DATE INCURRED 03/31/06	AMOUNT OWED TO CREDITOR \$14,048.80	AMOUNT OFFERED IN SETTLEMENT \$7,024.40
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TYPE OF CREDITOR:

☒ INCORPORATED COMMERCIAL VENDOR ☐ UNINCORPORATED COMMERCIAL VENDOR ☐ CANDIDATE ☐ COMMITTEE EMPLOYEE ☐ OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Vendor billed committee for services rendered on monthly basis. No extensions were granted.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

The committee has tried to pay this creditor as much as the committee's resources have allowed, without favor with respect to other creditors. The committee sold its physical assets (e.g. computers, phone system, office furniture) and research in order to raise funds. The candidate decided to use personal assets, to the best of his financial ability, to make substantial contributions to the committee in order to make creditors as whole as possible. The candidate is also forgiving a very substantial debt, \$211,250.00, owed to him by the committee. The committee undertook debt-reduction fundraising efforts, but raised little from doing so.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

Final bill and oral requests for payment.

CREDITOR SECTION (TO BE FILLED OUT BY CREDITOR)

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF CREDITOR OR REPRESENTATIVE
➤ SEE ATTACHED

DATE

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Matt Brown for U.S. Senate	FEC I.D. NUMBER C00409722	PAGE 7	OF 11
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CREDITOR SUMMARY INFORMATION

(FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR Reger Research 374 Lexington Rd. Richmond, VA 23226	DATE INCURRED	AMOUNT OWED TO CREDITOR	AMOUNT OFFERED IN SETTLEMENT
	03/31/06	\$58,085.24	\$29,042.62

TYPE OF CREDITOR:

☒ INCORPORATED COMMERCIAL VENDOR ☐ UNINCORPORATED COMMERCIAL VENDOR ☐ CANDIDATE ☐ COMMITTEE EMPLOYEE ☐ OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Vendor billed committee for services rendered on monthly basis. No extensions were granted.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

The committee has tried to pay this creditor as much as the committee's resources have allowed, without favor with respect to other creditors. The committee sold its physical assets (e.g. computers, phone system, office furniture) and research in order to raise funds. The candidate decided to use personal assets, to the best of his financial ability, to make substantial contributions to the committee in order to make creditors as whole as possible. The candidate is also forgiving a very substantial debt, \$211,250.00, owed to him by the committee. The committee undertook debt-reduction fundraising efforts, but raised little from doing so.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

CREDITOR SECTION

(TO BE FILLED OUT BY CREDITOR)

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF CREDITOR OR REPRESENTATIVE  SEE ATTACHED

DATE

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Matt Brown for U.S. Senate	FEC I.D. NUMBER C00409722	PAGE 8	OF 11
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CREDITOR SUMMARY INFORMATION (FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR Stones Phones 121 S. Palm Canyon Dr., Ste. 20 Palms Springs, CA 92262	DATE INCURRED 03/31/06	AMOUNT OWED TO CREDITOR \$13,509.56	AMOUNT OFFERED IN SETTLEMENT \$6,754.78
--	-------------------------------	--	--

TYPE OF CREDITOR:

☒ INCORPORATED COMMERCIAL VENDOR ☐ UNINCORPORATED COMMERCIAL VENDOR ☐ CANDIDATE ☐ COMMITTEE EMPLOYEE ☐ OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Vendor billed committee for services rendered on monthly basis. No extensions were granted.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

The committee has tried to pay this creditor as much as the committee's resources have allowed, without favor with respect to other creditors. The committee sold its physical assets (e.g. computers, phone system, office furniture) and research in order to raise funds. The candidate decided to use personal assets, to the best of his financial ability, to make substantial contributions to the committee in order to make creditors as whole as possible. The candidate is also forgiving a very substantial debt, \$211,250.00, owed to him by the committee. The committee undertook debt-reduction fundraising efforts, but raised little from doing so.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

Final bill and oral requests for payment.

CREDITOR SECTION (TO BE FILLED OUT BY CREDITOR)

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF CREDITOR OR REPRESENTATIVE > SEE ATTACHED

DATE

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Matt Brown for U.S. Senate	FEC I.D. NUMBER C00409722	PAGE 9	OF 11
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CREDITOR SUMMARY INFORMATION (FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR The Competence Group 1248 W. Atgield Chicago, IL 60614	DATE INCURRED 03/31/06	AMOUNT OWED TO CREDITOR \$39,737.02	AMOUNT OFFERED IN SETTLEMENT \$19,868.51
---	-------------------------------	--	---

TYPE OF CREDITOR:

☒ INCORPORATED COMMERCIAL VENDOR ☐ UNINCORPORATED COMMERCIAL VENDOR ☐ CANDIDATE ☐ COMMITTEE EMPLOYEE ☐ OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Vendor billed committee for services rendered on monthly basis. No extensions were granted.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

The committee has tried to pay this creditor as much as the committee's resources have allowed, without favor with respect to other creditors. The committee sold its physical assets (e.g. computers, phone system, office furniture) and research in order to raise funds. The candidate decided to use personal assets, to the best of his financial ability, to make substantial contributions to the committee in order to make creditors as whole as possible. The candidate is also forgiving a very substantial debt, \$211,250.00, owed to him by the committee. The committee undertook debt-reduction fundraising efforts, but raised little from doing so.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

Final bill and oral requests for payment.

CREDITOR SECTION (TO BE FILLED OUT BY CREDITOR)

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

SEE ATTACHED

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF CREDITOR OR REPRESENTATIVE
➤ SEE ATTACHED

DATE

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Matt Brown for U.S. Senate	FEC I.D. NUMBER C00409722	PAGE 10	OF 11
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CREDITOR SUMMARY INFORMATION

(FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR Mr. Matthew A. Brown 96 Everett Ave. Providence, RI 02906-4239	DATE INCURRED 01/20/06	AMOUNT OWED TO CREDITOR \$211,250.00	AMOUNT OFFERED IN SETTLEMENT \$0
---	-------------------------------	---	---

TYPE OF CREDITOR:

☐ INCORPORATED COMMERCIAL VENDOR ☐ UNINCORPORATED COMMERCIAL VENDOR ☒ CANDIDATE ☐ COMMITTEE EMPLOYEE ☐ OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

The candidate made loans to the committee totaling \$211,250.00.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

The candidate will forego the debt owed to him by the committee.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

N/A

CREDITOR SECTION

(TO BE FILLED OUT BY CREDITOR)

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☐ YES ☒ NO IF NO, PLEASE EXPLAIN

N/A

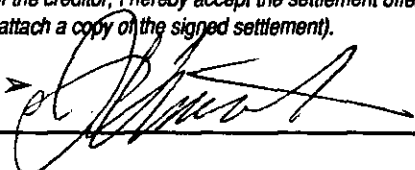
E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

☐ YES ☒ NO IF NO, PLEASE EXPLAIN

The candidate will forego the entirety of the debt owed to him by the committee, while the other creditors were offered and accepted a payment of 50 percent of the outstanding debt owed to them.

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF
CREDITOR OR
REPRESENTATIVE



DATE

3/20/07

27020390703

DEBT SETTLEMENT PLAN

PART III

NAME OF COMMITTEE Matt Brown for U.S. Senate	FEC I.D. NUMBER C00409722	PAGE 11	OF 11
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LIST REMAINING DEBTS

A. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR	AMOUNT OWED TO CREDITOR	AMOUNT EXPECTED TO PAY/OFFER
Ms. Jocelyn Augustino 3416 Gunston Rd. Alexandria, VA 22302 TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input checked="" type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	\$5,264.54	\$2,632.27
B. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO		
C. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO		
D. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO		
E. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO		

DOES THE COMMITTEE HAVE SUFFICIENT FUNDS TO PAY THE REMAINING AMOUNTS TO BE PAID OR OFFERED?

☐ YES ☒ NO IF NO, WHAT STEPS WILL BE TAKEN TO OBTAIN THE FUNDS? If Ms. Augustino responds to the committee's written communications prior to termination, the committee will again offer her the same terms as it as offered to other creditors.

LAW OFFICES
LICHTMAN, TRISTER & ROSS, PLLC

1666 CONNECTICUT AVENUE, N.W., FIFTH FLOOR

WASHINGTON, D.C. 20005

PHONE: (202) 328-1666

FAX: (202) 328-9162

www.ltrlaw.com

ELLIOTT C. LICHTMAN
MICHAEL B. TRISTER
GAIL E. ROSS
B. HOLLY SCHADLER

KAREN A. POST
LILAH S. ROSENBLUM
ALLEN H. MATTISON
ADMITTED IN MARYLAND ONLY

LAURENCE E. GOLD
Of Counsel

May 8, 2007

By Hand

Mr. Navarro Moore
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: Matt Brown for U.S. Senate
FEC ID #C00409722

Dear Mr. Moore:

Enclosed as we discussed are the intended attachments to the Form 8 that the Committee filed on April 25, 2007.

Thank you for your consideration.

Yours truly,



Laurence E. Gold
Counsel to Matt Brown for U.S. Senate

27020390705

07 NOV 14 PM 5:36

1
WAS THE EFFORT MADE BY YOU TO COLLECT THE DEBT SIMILAR TO OTHER DEBT
COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE
BY YOU WITH OTHER NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

AS A REPRESENTATIVE OF THE CREDITOR, I HEREBY ACCEPT THE SETTLEMENT OFFER MADE
TO ME BY THE COMMITTEE AND MATT BROWN AND UPON PAYMENT AGREE TO CONSIDER
THE DEBT SATISFIED AND RELEASE THE COMMITTEE AND MATT BROWN FROM ANY FURTHER
CLAIMS.

GILBERT & WOLFAND, PC.

SIGNATURE OF CREDITOR
OR REPRESENTATIVE

By: _____

AC Gilbert CA/President

12/23/06
DATE

1

WAS THE EFFORT MADE BY YOU TO COLLECT THE DEBT SIMILAR TO OTHER DEBT
COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE
BY YOU WITH OTHER NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

AS A REPRESENTATIVE OF THE CREDITOR, I HEREBY ACCEPT THE SETTLEMENT OFFER MADE
TO ME BY THE COMMITTEE AND MATT BROWN AND UPON PAYMENT AGREE TO CONSIDER
THE DEBT SATISFIED AND RELEASE THE COMMITTEE AND MATT BROWN FROM ANY FURTHER
CLAIMS.

BENENSON STRATEGY GROUP

SIGNATURE OF CREDITOR
OR REPRESENTATIVE

By: Peter J. Jordon

11 / 27 / 06
DATE

WAS THE EFFORT MADE BY YOU TO COLLECT THE DEBT SIMILAR TO OTHER DEBT
COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE
BY YOU WITH OTHER NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

AS A REPRESENTATIVE OF THE CREDITOR, I HEREBY ACCEPT THE SETTLEMENT OFFER MADE
TO ME BY THE COMMITTEE AND MATT BROWN AND UPON PAYMENT AGREE TO CONSIDER
THE DEBT SATISFIED AND RELEASE THE COMMITTEE AND MATT BROWN FROM ANY FURTHER
CLAIMS.

GRASSROOTS SOLUTIONS INC.

SIGNATURE OF CREDITOR
OR REPRESENTATIVE

By:



11 / 30 / 06
DATE

WAS THE EFFORT MADE BY YOU TO COLLECT THE DEBT SIMILAR TO OTHER DEBT
COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE
BY YOU WITH OTHER NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

AS A REPRESENTATIVE OF THE CREDITOR, I HEREBY ACCEPT THE SETTLEMENT OFFER MADE
TO ME BY THE COMMITTEE AND MATT BROWN AND UPON PAYMENT AGREE TO CONSIDER
THE DEBT SATISFIED AND RELEASE THE COMMITTEE AND MATT BROWN FROM ANY FURTHER
CLAIMS.

MACWILLIAMS, ROBINSON & PARTNES

SIGNATURE OF CREDITOR
OR REPRESENTATIVE

By: _____

12/14/06
DATE

WAS THE EFFORT MADE BY YOU TO COLLECT THE DEBT SIMILAR TO OTHER DEBT
COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?



YES



NO

IF NO, PLEASE EXPLAIN

ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE
BY YOU WITH OTHER NONPOLITICAL DEBTORS?



YES



NO

IF NO, PLEASE EXPLAIN

AS A REPRESENTATIVE OF THE CREDITOR, I HEREBY ACCEPT THE SETTLEMENT OFFER MADE
TO ME BY THE COMMITTEE AND MATT BROWN AND UPON PAYMENT AGREE TO CONSIDER
THE DEBT SATISFIED AND RELEASE THE COMMITTEE AND MATT BROWN FROM ANY FURTHER
CLAIMS.

NET POLITICS GROUP

SIGNATURE OF CREDITOR
OR REPRESENTATIVE

By: 

12, 4, 06
DATE

WAS THE EFFORT MADE BY YOU TO COLLECT THE DEBT SIMILAR TO OTHER DEBT
COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☐ YES

☒ NO

IF NO, PLEASE EXPLAIN I HAVE NEVER BEEN IN A
SITUATION WHERE I NEEDED TO COLLECT
FROM A NONPOLITICAL DEBTOR.

ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE
BY YOU WITH OTHER NONPOLITICAL DEBTORS?

☐ YES

☒ NO

IF NO, PLEASE EXPLAIN I HAVE NEVER COLLECTED
OR SETTLED WITH NONPOLITICAL DEBTORS. I
HAVE NEVER BEEN IN A SITUATION WHERE I NEEDED
TO SETTLE WITH A NONPOLITICAL DEBTOR.

AS A REPRESENTATIVE OF THE CREDITOR, I HEREBY ACCEPT THE SETTLEMENT OFFER MADE
TO ME BY THE COMMITTEE AND MATT BROWN AND UPON PAYMENT AGREE TO CONSIDER
THE DEBT SATISFIED AND RELEASE THE COMMITTEE AND MATT BROWN FROM ANY FURTHER
CLAIMS.

ALAN REGER

SIGNATURE OF CREDITOR
OR REPRESENTATIVE

By: Alan Reger

11 / 28 / 06
DATE

WAS THE EFFORT MADE BY YOU TO COLLECT THE DEBT SIMILAR TO OTHER DEBT
COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?



YES



NO

IF NO, PLEASE EXPLAIN

ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE
BY YOU WITH OTHER NONPOLITICAL DEBTORS?



YES



NO

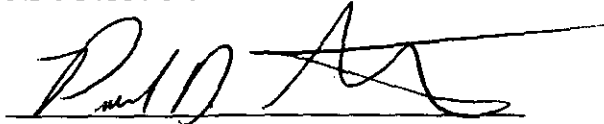
IF NO, PLEASE EXPLAIN

AS A REPRESENTATIVE OF THE CREDITOR, I HEREBY ACCEPT THE SETTLEMENT OFFER MADE
TO ME BY THE COMMITTEE AND MATT BROWN AND UPON PAYMENT AGREE TO CONSIDER
THE DEBT SATISFIED AND RELEASE THE COMMITTEE AND MATT BROWN FROM ANY FURTHER
CLAIMS.

STONES PHONES

SIGNATURE OF CREDITOR
OR REPRESENTATIVE

By:



PAUL D. STONE

12 / 01 / 2006
DATE

WAS THE EFFORT MADE BY YOU TO COLLECT THE DEBT SIMILAR TO OTHER DEBT
COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN


ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE
BY YOU WITH OTHER NONPOLITICAL DEBTORS?

☒ YES ☐ NO IF NO, PLEASE EXPLAIN

AS A REPRESENTATIVE OF THE CREDITOR, I HEREBY ACCEPT THE SETTLEMENT OFFER MADE
TO ME BY THE COMMITTEE AND MATT BROWN AND UPON PAYMENT AGREE TO CONSIDER
THE DEBT SATISFIED AND RELEASE THE COMMITTEE AND MATT BROWN FROM ANY FURTHER
CLAIMS.

THE COMPETENCE GROUP

SIGNATURE OF CREDITOR
OR REPRESENTATIVE

By: 

11/27/06
DATE

07 NOV 14 PM 5:37

Federal Election Commission
Washington, DC 20463

Case Number: ADR 408
Source: RAD 07L-24
Case Name: Matt Brown for U.S. Senate

NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission ("FEC" or "the Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended ("the FECA"), and resolve this matter, the Commission entered into negotiations with Laurence E. Gold, representing Matt Brown for U.S. Senate and Timothy Patterson, in his official capacity as Treasurer (collectively "Respondents" or "the Committee"). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:


1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures ("ADR") is guided by the Administrative Dispute Resolution Act of 1996, 5 U.S.C. § 572, and is an extension of 2 U.S.C. § 437g.
2. Respondents voluntarily enter into this agreement with the Commission.
3. The Committee failed to report \$94,835.32 in additional debt on its 2006 April Quarterly Report (a 55% increase) and \$54,669.69 on its 2006 July Quarterly Report (a 17% increase). The Committee amended both reports twice, and in response to the RFAs on both reports, the Committee stated that numerous invoices relating to the additional debt were received late and that the Committee had undergone a series of financial and other setbacks, including staff layoffs. The Committee apologized for the inadvertent errors.
4. Respondents state that they filed these amended reports on their own initiative and were not previously contacted by the Commission about the possibility of errors in the original reports. Respondents further state that prior to the Commission's initiation of this matter Respondents hired a campaign finance specialist to review and correct their FEC filings.
5. Treasurers of political committees are required to report all financial activity, including debts pursuant to the FECA. 2 U.S.C. § 434(b)(8), 11 C.F.R. § 104.3(d).

6. Respondents, in an effort to resolve this matter, agree to: (a) pay a \$1,100 civil penalty and (b) work with Commission Staff in terminating the Committee.
7. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this agreement under penalty of perjury pursuant to 28 U.S.C. § 1746.
8. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may submit any unpaid civil penalty to the U.S. Treasury for collection or undertake civil action in the U.S. District Court for the District of Columbia to secure compliance.
9. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms set forth in paragraph 6 within thirty (30) days of the effective date of this agreement.
10. This Negotiated Settlement constitutes the entire agreement between the parties on the resolution of ADR 408 (RAD 07L-24), and effectively resolves only those issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party that is not included herein shall be enforceable.

FOR THE COMMISSION:

By:  10/23/07
Deborah Ruth Kant, Director Date Signed
Alternative Dispute Resolution Office

FOR THE RESPONDENTS:

 October 15, 2007
Laurence E. Gold, Date Signed
Representing Matt Brown for U.S. Senate,
and Timothy Patterson, in his official capacity as Treasurer

27020390715

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Matt Brown for US Senate and Tim) ADR 408
Patterson, Treasurer (RAD 07L-24))

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby
certify that on October 22, 2007, the Commission decided by a vote of 5-0 to take
the following actions in ADR 408/RAD 07L-24:

1. Approve the settlement agreement of Matt Brown for U.S. Senate,
and Tim Patterson, as recommended in the ADR Director's
Memorandum dated October 16, 2007.
2. Approve the appropriate letters.
3. Close the file on this matter.

Commissioners Lenhard, Mason, von Spakovsky, Walther and Weintraub
voted affirmatively for the decision.

Attest:

October 23, 2007
Date

Mary W. Dove
Mary W. Dove
Secretary of the Commission

27020390716

NANCY ERICKSON
SECRETARY

PAMELA B. GAVIN
SUPERINTENDENT

HART SENATE OFFICE BUILDING
SUITE 232
WASHINGTON, DC 20510-7118
PHONE: (202) 224-0322

United States Senate

OFFICE OF THE SECRETARY

OFFICE OF PUBLIC RECORDS

THE PRECEDING DOCUMENT WAS:

HAND DELIVERED

11-14-07

Date of Receipt

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USPS PRIORITY MAIL

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USPS EXPRESS MAIL

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OVERNIGHT DELIVERY SERVICE:

SHIPPING DATE

NEXT BUSINESS DAY DELIVERY

FEDERAL EXPRESS

☐

UPS

☐

DHL

☐

AIRBORNE EXPRESS

☐

RECEIVED FROM FEDERAL ELECTION COMMISSION

Date of Receipt

POSTMARK ILLEGIBLE ☐

NO POSTMARK ☐

FAX

Date of Receipt

OTHER

Date of Receipt or Postmark

PREPARER

RD

DATE PREPARED

11-14-07

27020390717

27020390718

